

James M. McDonnell, Esq. (Bar ID# 030572001)
JACKSON LEWIS P.C.
200 Connell Drive, Suite 2000
Berkeley Heights, New Jersey 07922
Tel: 908.795.5200
ATTORNEYS FOR DEFENDANT
CAPSUGEL US, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CPM CONSULTING LLC AND	:	
MARTINO RIVAPLATA,	:	
	:	Case No. 2:19-cv-16579-JMV-JBC
Plaintiffs,	:	
	:	
vs.	:	
	:	NOTICE OF MOTION FOR
CAPSUGEL US, LLC	:	TAXATION OF COSTS
	:	
Defendant.	:	Return date: NOVEMBER 2, 2020
	:	

PLEASE TAKE NOTICE that upon the annexed Declaration of Talley R. Parker (“Parker Declaration”), dated October 5, 2020; the Order on Defendant’s Motion for Summary Judgment in favor of Defendant Capsugel US, LLC (“Defendant”), dated September 21, 2020, and entered on the docket in this case on September 21, 2020, annexed to the Parker Declaration as Exhibit 1; the Bill of Costs submitted by Jackson Lewis P.C., attorneys for Defendant, annexed to the Parker Declaration as Exhibit 2; the supporting documentation annexed to the Parker Declaration as Exhibits 3 and 4; and all papers and proceedings herein; the undersigned will move the Clerk for the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street Room 4015, Newark, NJ 07101 on November 2, 2020, or as soon thereafter as counsel may be heard, for an order granting to Defendant its taxable costs in the amount of \$1,635.16

pursuant to 28 U.S.C. § 1920, Rule 54 of the Federal Rules of Civil Procedure, and Rule 54.1 of the Local Civil Rules of the United States District Court for the District of New Jersey.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 54.1(f), objections in writing, if any, must be served prior to or at the time of hearing.

Respectfully submitted,

/s/ James M. McDonnell
James M. McDonnell (Bar ID #030572001)
JACKSON LEWIS, P.C.
200 Connell Drive, Suite 200
Berkeley Heights, New Jersey 07922
Telephone: 908-795-5200
Facsimile: 908-464-2614
James.McDonnell@jacksonlewis.com

Talley R. Parker
Texas Bar No. 24065872
(Admitted *Pro Hac Vice*)
Melanie Uremovich
Texas Bar No. 24106538
(Admitted *Pro Hac Vice*)
JACKSON LEWIS P.C.
500 N. Akard, Suite 2500
Dallas, Texas 75201
Telephone: 214-520-2400
Facsimile: 214-520-2008
Talley.Parker@jacksonlewis.com
Melanie.Uremovich@jacksonlewis.com

**ATTORNEYS FOR DEFENDANT
CAPSUGEL US, LLC**

Dated: October 5, 2020